

**DAVIS WRIGHT TREMAINE LLP**

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*Attorneys for Defendant The GEO Group, Inc.,  
incorrectly sued as GEO Re-Entry Group, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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CITY OF NEWARK,	:	
	:	
Plaintiff,	:	No. 2:25-cv-02225-JKS-LDW
	:	
- against -	:	
	:	
GEO RE-ENTRY GROUP, LLC;	:	Motion Day: May 5, 2025
ABC CORPS. (A FICTIOUS	:	
COMPANY) 1-100,	:	
	:	<b>NOTICE OF MOTION</b>
Defendants.	:	
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**PLEASE TAKE NOTICE** that the undersigned attorneys for Defendant The GEO Group, Inc., incorrectly sued as GEO Re-Entry Group, LLC (“GEO”), will move before the Honorable Jamel K. Semper, United States District Court Judge, District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 on May 5, 2025, or a date to be assigned by the Court, for an Order, in the form of one of the proposed orders enclosed herewith, joining U.S. Immigration and Customs Enforcement (“ICE”) as a necessary party to

this action pursuant to Rule 12(b)(7) and Rule 19 of the Federal Rules of Civil Procedure and thereafter dismissing the case with prejudice pursuant to Rule 19(b) of the Federal Rules of Civil Procedure after concluding that joinder of ICE is infeasible due to the doctrine of sovereign immunity, or—in the alternative—ordering Plaintiff to file a more definite statement pursuant to Rule 12(e) of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that in support of the within motion, GEO shall rely on (i) its memorandum of law in support of its motion, filed herewith, and (ii) the previously filed Declaration of Esker L. Tatum, Jr, *see* ECF No. 2.

**PLEASE TAKE FURTHER NOTICE** that two proposed orders granting the motion are also submitted herewith.

Dated: April 9, 2025

DAVIS WRIGHT TREMAINE LLP

By: /s/ Geoffrey S. Brounell

Geoffrey S. Brounell

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THE GEO GROUP, INC.

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